

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

| | | |
|---------------------------|---|---------------------------|
| UNITED RESOURCE RECOVERY |) | Case Number: 7:07-502-HFF |
| CORPORATION, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| RAMKO VENTURE MANAGEMENT, |) | |
| INC.and JOHN KOHUT, |) | |
| |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |
| RAMKO VENTURE MANAGEMENT, |) | |
| INC., |) | |
| |) | |
| Third-Party Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| |) | |
| |) | |
| CARLOS GUTIERREZ, |) | |
| |) | |
| Third-Party Defendant. |) | |
| _____ |) | |

**EXPERT WITNESS IDENTIFICATION OF DEFENDANTS
RAMKO VENTURE MANAGEMENT, INC. AND JOHN KOHUT**

The Defendants, RamKo Venture Management, Inc. (“RamKo”) and John Kohut (“Kohut”), pursuant to Paragraph 6 of the Court’s Scheduling Order dated June 18, 2007, hereby designate as an expert witness Philip W. Seefried, Jr., Headwaters MB, LLC, 1200 17th Street, Suite 900, Denver, CO 80202, telephone (303) 572-6004.

Defendants, by their undersigned counsel, certify that a written report prepared and signed by Mr. Seefried including all information required by Fed. R. Civ. P. 26(a)(2)(B) on which Mr. Seefried is currently able to opine, has been disclosed to the other parties in this case. Mr. Seefried will supplement his report, following his examination of financial data currently awaiting orderly production by plaintiff URRC in response to defendants' document request.

By: s/Julianne Farnsworth

Julianne Farnsworth

Federal Bar # 4438

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ATTORNEY FOR DEFENDANTS

October 15, 2007
Charleston, South Carolina